

EXHIBIT 3: EXCERPTS OF DEPOSITION OF BILL JONES

FOSHEE & TURNER COURT REPORTERS

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF ALABAMA
3 NORTHERN DIVISION

4
5 HAZEL M. ROBY, as Administratrix
6 of the Estate of RONALD TYRONE ROBY,
7 deceased,

8 Plaintiff,

9 CIVIL ACTION FILE

10 vs.

11 NO. 2:05CV194-T

12 BENTON EXPRESS, INC., et al.,

13 Defendants.

14
15 VIDEOTAPED DEPOSITION OF
16 GEORGE WILLIAM JONES

17
18 September 26, 2005

19 2:22 p.m.

20
21 1180 West Peachtree Street

22 Suite 900

23 Atlanta, Georgia

24
25 Lisa Fischer, CCR-B-1277, RPR, CRR

 **COPY**

FOSHEE & TURNER COURT REPORTERS

Page 104

1 A. No.

2 Q. Became aware they did that?

3 A. No.

4 Q. Do you have any idea the normal time
5 it takes for one of your drivers to go from
6 Atlanta to Pensacola?

7 A. Five to six-and-a-half hours.

8 Q. What kind of things will vary the
9 length of a route like that? Just say
10 sometimes it's five to six and a half. I know
11 that's a simple question; but for laypeople who
12 may not know, can you tell me some of the
13 factors that would vary on a route like that,
14 that you may be able to drive it one time in
15 five, and six and a half the next time?

16 A. The traffic, fueling, mechanical
17 situations, weather.

18 Q. And when you meant (sic) "fueling,"
19 you meant like if you have to stop versus not
20 stopping?

21 A. Yes, sir.

22 Q. Does the typical truck have enough
23 fuel in it that they can go from Atlanta to
24 Pensacola and Pensacola back to Atlanta without
25 fueling, if it's full?

FOSHEE & TURNER COURT REPORTERS

Page 105

1 A. If it's full, yes.

2 Q. Have you ever drove or rode with
3 anybody from Atlanta to Pensacola on the route
4 we think Mr. Craig Stephens was taking?

5 MR. BROCKWELL: Object to the form.

6 THE WITNESS: Have I ever driven
7 in an automobile?

8 Q. (By Mr. Boone) Yes.

9 A. Yes.

10 Q. And do you recall how long it took you
11 when you were driving in an automobile?

12 A. No, sir.

13 Q. Was it just going down there for
14 vacation or reporting to --

15 A. For pleasure, yes, sir.

16 Q. Pleasure.

17 Do you routinely go to the seminars to
18 keep you updated on trucking, the trucking
19 industry?

20 A. No, I don't.

21 Q. Have you been to any in the last two
22 years?

23 A. No.

24 Q. Do you get any kind of --

25 A. You mean outside seminars?